

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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JOHN DOE,

Plaintiff,

v.

RIDER UNIVERSITY,

Defendant.

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Civil Action No. 3:16-CV-04882-BRM-TJB

**NOTICE OF MOTION OF PLAINTIFF  
FOR ADMISSION OF ANDREW S.  
GALLINARO *PRO HAC VICE***

**Return Date: November 26, 2018**

**PLEASE TAKE NOTICE** that the undersigned, on behalf of Plaintiff John Doe, will move before the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, on November 26, 2018 or as soon thereafter as the Court permits, at a time to be determined, pursuant to Local Rule 101.1 for the admission *pro hac vice* of Andrew S. Gallinaro; and

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely on the attached certifications of Kevin Dooley Kent and Andrew S. Gallinaro in support of this Motion; and

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests that the proposed form of Order submitted herewith be entered by the Court.

Respectfully submitted,

Dated: November 1, 2018

s/ Kevin D. Kent

Kevin D. Kent, Esquire  
Conrad O'Brien PC  
1500 Market Street, Suite 3900  
Centre Square, West Tower  
Philadelphia, PA 19102  
Phone: 215-864-9600/Fax: 215-864-9620  
Email: [kkent@conradobrien.com](mailto:kkent@conradobrien.com)  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
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**CERTIFICATION OF KEVIN D. KENT**

I, Kevin D. Kent, an attorney duly admitted to practice in the Courts of the State of New Jersey and the United States District Court for the District of New Jersey, hereby move for admission *pro hac vice* of Andrew S. Gallinaro and certify as follows:

1. I am a partner of the law firm of Conrad O'Brien PC, attorneys for Plaintiff. I respectfully submit this certification in support of the application for the admission *pro hac vice* of Andrew S. Gallinaro, pursuant to Local Civil Rule 101.1(c).

2. I am a member in good standing admitted to practice before all New Jersey state courts, the United States District Court for the District of New Jersey, the Pennsylvania state courts, the United States District Courts for the Eastern and Western Districts of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court. I am also licensed to practice as a solicitor in Ireland, England and Wales.

3. I have reviewed the Certification of Andrew S. Gallinaro and respectfully submit that there is good cause for his admission *pro hac vice*.

4. As set forth in Mr. Gallinaro's Certification in support of this Motion, Mr. Gallinaro is a shareholder in the law firm Conrad O'Brien PC and a member in good standing admitted to practice before all Commonwealth of Pennsylvania courts since 2005. Mr. Gallinaro is also licensed to practice and is an active member in good standing in the United States District Court for the Eastern District of Pennsylvania and the United States Court of Appeals for the Third Circuit.

5. It is requested that Mr. Gallinaro be permitted to represent Plaintiff in the instant matter because there is an established attorney-client relationship between Mr. Gallinaro and Plaintiff and he is fully familiar with the facts and circumstances of the case.

6. This litigation stems from false allegations of sexual assault made against Plaintiff while a freshman at Rider University and the University's flawed Title IX disciplinary process that resulted in Plaintiff being unfairly found guilty of sexual assault and expelled from the University. Mr. Gallinaro has significant experience representing college students, like Plaintiff, that have been subjected to campus disciplinary proceedings or who have been suspended, expelled from or otherwise disciplined by their colleges following campus disciplinary hearings for alleged sexual misconduct or other alleged student code violations. Accordingly, Mr. Gallinaro has specific expertise in connection with these Title IX matters, which will be beneficial to both the Court and Plaintiff in this matter.

7. As an attorney admitted to practice before this Court and a partner of Conrad O'Brien PC, I am authorized to sign and accept service of any and all pleadings, briefs, and other papers on behalf of Plaintiff in this matter, and will continue to act as counsel of record for Plaintiff.

8. I agree to be bound by all requirements of Local Civil Rule 101.1 and pursuant to the Rule, I understand that all pleadings, briefs, and such other papers filed with the Court shall be signed by me or another attorney associated with Conrad O'Brien PC admitted to practice before this Court. I also agree to promptly notify any attorneys admitted *pro hac vice* of all notices, orders, etc.

9. I shall be responsible for the conduct of Mr. Gallinaro, who is requesting admission *pro hac vice* in this case.

10. If admitted, Mr. Gallinaro will pay the fees required by New Jersey Court Rule 1:28-2(a) and the \$150.00 fee payable to the Clerk of the District Court.

11. Attached hereto as Exhibit A is Mr. Gallinaro's Certification.

12. Defendant does not oppose Mr. Gallinaro's admission *pro hac vice*.

13. It is, therefore, respectfully requested that Mr. Gallinaro be admitted to the Bar of this Court *pro hac vice* for all purposes in this matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 1, 2018

s/ Kevin D. Kent

Kevin D. Kent, Esquire

*Attorney for Plaintiff*

# Exhibit A

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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JOHN DOE,

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Civil Action No. 3:16-CV-04882-BRM-TJB

**CERTIFICATION OF ANDREW S. GALLINARO**

1. I submit this Certification in support of this Motion for my admission *pro hac vice* before this Court in the above-captioned matter.
2. I am a shareholder in the law firm Conrad O'Brien PC, which represents Plaintiff in the above-captioned matter.
3. I am a member in good standing admitted to practice before all Commonwealth of Pennsylvania courts since 2005. The Disciplinary Board of the Supreme Court of Pennsylvania, located at Pennsylvania Judicial Center, 601 Commonwealth Ave, Suite 5600, P.O. Box 62625, Harrisburg, Pennsylvania, 17106-2625, maintains the roll of members of its bar. I am also licensed to practice and am an active member in good standing in the United States District Court for the Eastern District of Pennsylvania and the United States Court of Appeals for the Third Circuit.
4. I certify that I am not now and never have been subject to any disciplinary proceedings in any jurisdiction in which I am admitted to practice, nor have I ever been disbarred or formally censured by a court of record or by a state bar association. I understand that I have a

continuing obligation during the period of admission *pro hac vice* to advise this Court of any new disciplinary proceedings or any matter affecting my standing at the bar of any other court. I agree to follow the rules and procedures of this Court, New Jersey's Rules of Professional Conduct, Local Civil Rule 101.1(c), and any additional procedures required of the Court.

5. I have an established attorney-client relationship with Plaintiff and I am fully familiar with the facts and circumstances of the case.

6. This litigation stems from false allegations of sexual assault made against Plaintiff while a freshman at Rider University and the University's flawed Title IX disciplinary process that resulted in Plaintiff being unfairly found guilty of sexual assault and expelled from the University. I have significant experience representing college students, like Plaintiff, that have been subjected to campus disciplinary proceedings or who have been suspended, expelled from or otherwise disciplined by their colleges following campus disciplinary hearings for alleged sexual misconduct or other alleged student code violations. My expertise in connection with these Title IX matters will be beneficial to both the Court and Plaintiff in this matter.

7. In the event I am granted admission *pro hac vice*, I agree to (a) abide by the rules governing the Court, including all disciplinary rules; (b) notify the Court immediately of any matter affecting my standing at the Bar of any other court; and (c) ensure that all pleadings, briefs, and other papers filed with this Court shall be signed by an attorney of record authorized to practice in this State who shall be held responsible for my conduct in this case pursuant to the terms of the Order.

8. In the event I am granted admission *pro hac vice*, I will ensure that the appropriate payment is made on my behalf to the New Jersey Lawyers' Fund for Client

Protection as required by New Jersey Court Rule 1:28-2(a). I also will arrange for payment of \$150.00 to the Clerk of the District Court as required by Local Civil Rule 101.1(c)(3).

9. Accordingly, I respectfully request that the Court grant this Motion for my admission *pro hac vice* in this case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 1, 2018

s/ Andrew S. Gallinaro  
Andrew S. Gallinaro, Esq.



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Civil Action No. 3:16-CV-04882-BRM-TJB

**ORDER PERMITTING THE *PRO HAC VICE* ADMISSION  
OF ANDREW S. GALLINARO**

**THIS MATTER** has come before this Court upon the Motion of Plaintiff John Doe for entry of an Order, pursuant to Local Civil Rule 101.1(c), permitting the appearance *pro hac vice* of Andrew S. Gallinaro, a shareholder from the law firm Conrad O'Brien PC; and the Court having considered the Certifications of Kevin Dooley Kent and Andrew S. Gallinao, and the requirements for Mr. Gallinaro's appearance *pro hac vice* having been met; and good cause having been shown;

It is on this \_\_\_\_\_ day of \_\_\_\_\_, 2018,

**ORDERED** that the Motion seeking the admission *pro hac vice* of Mr. Gallinaro so that she may appear and participate in this matter on behalf of Plaintiff is hereby granted; and it is

**FURTHER ORDERED** that Mr. Gallinaro shall abide by the Federal Rules of Civil Procedure, the Local Civil Rules, and all disciplinary rules; and it is

**FURTHER ORDERED** that Mr. Gallinaro shall pay the fees required by New Jersey Court Rule 1:28-2(a) and shall have all pleadings, briefs, and other papers filed with the Court

signed by an attorney who is a member of the bar of this Court and who shall be held responsible for the conduct of Mr. Gallinaro; and it is

**FURTHER ORDERED** that Mr. Gallinaro shall make a payment of \$150.00, payable to the Clerk of the District Court.

**BY THE COURT:**

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**HONORABLE BRIAN R. MARTINOTTI  
U.S. DISTRICT COURT JUDGE**